

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

NETLIST, INC.,	)	
	)	
Plaintiff,	)	
	)	Case No. 2:22-cv-293-JRG
vs.	)	
	)	JURY TRIAL DEMANDED
SAMSUNG ELECTRONICS CO., LTD;	)	(Lead Case)
SAMSUNG ELECTRONICS AMERICA,	)	
INC.; SAMSUNG SEMICONDUCTOR	)	<div style="background-color: black; width: 150px; height: 1.2em;"></div>
INC.,	)	
	)	
Defendants.	)	

---

NETLIST, INC.,	)	
	)	
Plaintiff,	)	
	)	Case No. 2:22-cv-294-JRG
vs.	)	
	)	JURY TRIAL DEMANDED
MICRON TECHNOLOGY, INC.;	)	
MICRON SEMICONDUCTOR	)	
PRODUCTS, INC.; MICRON	)	
TECHNOLOGY TEXAS LLC,	)	
	)	
Defendants.	)	

---

**DECLARATION OF JASON G. SHEASBY IN SUPPORT OF NETLIST, INC.'S  
MOTION FOR SUMMARY JUDGMENT OF NO INEQUITABLE CONDUCT  
OR UNCLEAN HANDS DEFENSE**

**I, Jason G. Sheasby, declare as follows:**

1. I am an attorney at the law firm of Irell & Manella LLP, counsel of record for Plaintiff Netlist, Inc. (“Netlist”) in the above-captioned action. I am a member in good standing of the State Bar of California and have been admitted to practice *pro hac vice* before this Court in this action. I provide this declaration in support of Netlist, Inc.’s Motion for Summary Judgment of No Inequitable Conduct or Unclean Hands Defense. I have personal knowledge of the facts stated herein, and could and would testify completely thereto if called as a witness in this matter.

2. Attached as **Exhibit 1** is a true and correct excerpted copy of Samsung’s Supplemental Objections and Responses to Plaintiff Netlist Inc.’s Amended First Set of Interrogatories (Nos. 1-20) dated November 20, 2023.

3. Attached as **Exhibit 2** is a true and correct excerpted copy of the deposition transcript of Dr. Hyun Lee dated November 29, 2022 in *Netlist v. Samsung Elec. Co., Ltd.*, No. 21-cv-463-JRG (E.D. Tex.).

4. Attached as **Exhibit 3** is a true and correct copy of the bench trial transcript dated May 30, 2023 in *Netlist v. Samsung Elec. Co., Ltd.*, No. 21-cv-463-JRG (E.D. Tex.).

5. Attached as **Exhibit 4** is a true and correct copy of this court’s bench trial order. *Netlist v. Samsung Elec. Co., Ltd.*, No. 21-cv-463-JRG, Dkt. 550 (E.D. Tex.).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 16, 2024, in Marshall, Texas.

By /s/ Jason G. Sheasby  
Jason G. Sheasby